

MEMO

DATE: March 6, 2007

TO: Energy and Environment Committee

FROM: Jonathan Nadler, Program Manager, (213) 236-1884; nadler@scag.ca.gov

SUBJECT: 2008 RTP Conformity Update

BACKGROUND:

Transportation conformity is required under the federal Clean Air Act (CAA) to ensure that federally supported highway and transit project activities conform to the purpose of the State Implementation Plan (SIP). "Conformity" means that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the relevant National Ambient Air Quality Standards (NAAQS). Conformity applies to areas that are designated non-attainment, and those re-designated to attainment after 1990 ("maintenance areas") for the following transportation-related criteria pollutants: ozone, particulate matter (PM2.5 and PM10), carbon monoxide (CO), and nitrogen dioxide (NO₂).

The boundaries of the federal non-attainment/maintenance areas in the SCAG region are:

- *Ventura County Portion of the South Central Coast Air Basin (SCCAB)* - The entire county is a non-attainment area for 8-hour ozone
- *South Coast Air Basin (SCAB)* - The entire basin is a non-attainment for PM2.5 and 8-hour ozone, and a maintenance area for NO₂, CO, and PM10.
- *Antelope Valley and Victor Valley portions of Mojave Desert Air Basin (MDAB)* - Non-attainment areas for 8-hour Ozone
- *San Bernardino County Portion of MDAB* -
 - Searles Valley (situated in the NW part of the county) is non-attainment for PM10
 - San Bernardino County (excluding the Searles Valley area) within the MDAB is a non-attainment area for PM10
- *Riverside County Portion of Salton Sea Air Basin (SSAB)* - The entire Riverside County portion of SSAB (Coachella Valley) is a non-attainment area for PM10 and 8-hour ozone
- *Imperial County Portion of SSAB* - The entire Imperial County portion of SSAB is designated as non-attainment for 8-hour ozone and PM10.

The 2008 Regional Transportation Plan (RTP) must pass the following four tests and analyses to meet the requirements for a positive conformity finding:

Regional Emissions Analysis: Regional emissions analyses, by non-attainment area and by pollutant, compare on-road emissions to the applicable on-road emissions budgets in the SIPs for the SCAG Region. The applicable emissions budgets are those approved and found to be adequate for conformity determination by the U.S. Environmental Protection Agency (EPA). In the absence of applicable emissions budgets, the regional emission tests for conformity finding are based on either a build/no-build or less than base year scenario. In the SCAG region, build/no build tests are performed for PM10 in the San Bernardino County portion of the MDAB and for PM10 and ozone in the Imperial County portion of the SSAB. There are emission budgets for all other non-attainment areas in the SCAG region.

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Timely Implementation of TCMs Analysis: This conformity test requires all Transportation Control Measures (TCM) projects subject to reporting to be fully funded and on schedule. TCMS are projects which reduce congestion and improve air quality. In the SCAG Region, there are two non-attainment areas which contain TCMs: the ozone AQMPs/SIPs for the SCAB and for the Ventura County portion of SCCAB. SCAG works with the County Transportation Commissions of these areas to ensure TCMs are on schedule or that steps are being taken to overcome obstacles.

Financial Constraint Analysis: The RTP must be financially constrained. Staff have determined that the Draft 2008 RTP, which is financed by Federal, State, local, and private sources, meets the requirements for financial constraint, subject to comments received during the public comment period.

Interagency Consultation and Public Involvement: Throughout its development, the 2008 RTP has been extensively discussed at meetings of various policy committees, working groups (including the Transportation Conformity Working Group [TCWG]), task forces, and technical advisory committees.

The conformity analysis is a complicated and challenging endeavor, requiring detailed data collection, computer modeling, extensive inter-agency coordination, technical analysis, and report writing. Staff has worked with the regional partner agencies and the State and Federal agencies to resolve numerous difficult issues in preparing the conformity analysis.

CONFOMRITY ANALYSIS CONSIDERATIONS:

The formal conformity finding will be based on the projects, plans, and policies in the Final 2008 RTP. The regional emissions analysis for the Draft 2008 RTP is based on the 2008 RTP Draft Policy Growth Forecast, and that analysis indicates a positive conformity finding. Based on comments received during the Draft 2008 RTP public comment period, regional transportation model runs were also performed to assess conformity with the Draft Baseline Forecast. The results indicate that a positive conformity finding may also be achieved using the Baseline Growth Forecast.

On January 24, 2008, staff participated in a teleconference with representatives from the Federal agencies (FHWA, FTA, U.S. EPA, and ARB) to discuss conformity related issues on the Draft 2008 RTP. At that meeting, SCAG staff was informed about a lack of progress involving the U.S. EPA's adequacy finding for the transportation emission budgets used in the 2008 RTP. This is crucial for adoption of the 2008 RTP, as a formal finding of conformity cannot be made until U.S. EPA determines the adequacy of the emission budgets. This critical information and issue had not been raised or discussed at any of the prior monthly interagency meetings of the Transportation Conformity Working Group. SCAG staff has been working with the State and Federal agencies diligently to resolve this issue.

FISCAL IMPACT:

Work associated with this task is included in the current year overall work program (08-025.SCGS1)

Reviewed by:


Division Manager



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DOC#143935, EEC
March 2008

J. Nadler; 2/19/2008; 10:11:23 AM

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Reviewed by:



Department Director

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Chief Financial Officer